

ELIZABETH M. PIPKIN (243611)  
ANN M. RAVEL (62139)  
McMANIS FAULKNER  
50 West San Fernando Street, 10th Floor  
San Jose, CA 95113  
Telephone: (408) 279-8700  
Facsimile: (408) 279-3244  
epipkin@mcmanislaw.com  
aravel@mcmanislaw.com

GLEN E. SUMMERS (176402)  
KARMA M. GIULIANELLI (184175)  
LINDLEY J. BRENZA (*pro hac vice*)  
JONATHAN JACOB MARSH (*pro hac vice*)  
BARTLIT BECK LLP  
1801 Wewatta Street, Suite 1200  
Denver, CO 80202  
Telephone: (303) 592-3100

*Attorneys for Plaintiffs Joseph Taylor,  
Mick Cleary, and Jennifer Nelson*

MARC A. WALLENSTEIN (*pro hac vice*)  
GEORGE A. ZELCS (*pro hac vice*)  
CHAD E. BELL (*pro hac vice*)  
RYAN Z. CORTAZAR (*pro hac vice*)  
PAMELA I. YAACOUB (*pro hac vice*)  
KOREIN TILLERY LLC  
205 North Michigan Avenue, Suite 1950  
Chicago, IL 60601  
Telephone: (312) 641-9750  
Facsimile: (312) 641-9751

CAROL L. O'KEEFE (*pro hac vice*)  
MICHAEL E. KLENOV (277028)  
KOREIN TILLERY LLC  
505 North Seventh Street, Suite 3600  
St. Louis, MO 63101  
Telephone: (314) 241-4844  
Facsimile: (314) 241-3525

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

JOSEPH TAYLOR, MICK CLEARY, and  
JENNIFER NELSON, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-CV-07956-VKD

**DECLARATION OF CHAD E. BELL IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR STAY**

Judge: Hon. Virginia K. DeMarchi

1 I, Chad E. Bell, declare as follows:

2 1. I am an attorney at Korein Tillery LLC, counsel to Plaintiffs in the above-captioned  
3 matter. I am admitted to appear before this Court *pro hac vice* in this matter. I submit this  
4 Declaration in support of Plaintiffs' Motion for Stay. I have personal knowledge of the facts set  
5 forth in this Declaration and, if called as a witness, I could and would competently testify to these  
6 facts under oath.

7 2. Attached as **Exhibit 1** is a true and correct copy of the Complaint in *Csupo v.*  
8 *Google LLC*, No. 19CV352557 (Cal. Super. Ct.), dated August 9, 2019.

9 3. Attached as **Exhibit 2** is a true and correct copy of the Order After Hearing on July  
10 17, 2020 in *Csupo v. Google LLC*, No. 19CV352557 (Cal. Super. Ct.), dated August 21, 2020.

11 4. Attached as **Exhibit 3** is a true and correct copy of the Order Concerning: (1) the  
12 Parties' Expert Exclusion Motions; and (2) Plaintiffs' Class Certification Motion in *Csupo v.*  
13 *Google LLC*, No. 19CV352557 (Cal. Super. Ct.), dated October 26, 2023.

14 5. Attached as **Exhibit 4** is a true and correct copy of the Order Concerning:  
15 (1) Defendant's Motion for Summary Judgment or, in the Alternative, Summary Adjudication;  
16 and (2) Defendant's Motion to Seal in *Csupo v. Google LLC*, No. 19CV352557 (Cal. Super. Ct.),  
17 dated May 2, 2025.

18 6. Attached as **Exhibit 5** is a true and correct copy of the Order Concerning:  
19 (1) Defendant's Motion to Decertify; and (2) Plaintiffs' Motion to Add Classwide Transfers in  
20 *Csupo v. Google LLC*, No. 19CV352557 (Cal. Super. Ct.), dated May 12, 2025.

21 7. Attached as **Exhibit 6** is a true and correct copy of the Order Concerning:  
22 (1) Plaintiffs' Motion to Exclude Expert Testimony; (2) Defendant's Motions to Exclude Expert  
23 Testimony; and (3) Plaintiffs' Motion to Exclude Surprise Witnesses in *Csupo v. Google LLC*, No.  
24 19CV352557 (Cal. Super. Ct.), dated May 27, 2025.

25 8. Attached as **Exhibit 7** is a true and correct copy of the Jury Verdict in *Csupo v.*  
26 *Google LLC*, No. 19CV352557 (Cal. Super. Ct.), dated July 1, 2025.

27

28

1           9.       Attached as **Exhibit 8** is a true and correct copy of Google's Motion for Judgment  
2 Notwithstanding the Verdict or a New Trial in *Csupo v. Google LLC*, No. 19CV352557 (Cal.  
3 Super. Ct.), dated August 7, 2025.

4           10.      Attached as **Exhibit 9** is a true and correct copy of Plaintiffs' Opposition to  
5 Google's Motion for Judgment Notwithstanding the Verdict or New Trial in *Csupo v. Google LLC*,  
6 No. 19CV352557 (Cal. Super. Ct.), dated August 27, 2025.

7           11.      Attached as **Exhibit 10** is a true and correct copy of an email string between W.  
8 Somvichian and T. Duarte re *Csupo v. Google LLC*, No. 19CV352557 (Cal. Super. Ct.), dated  
9 between August 5–6, 2025.

10           I declare under penalty of perjury that the foregoing is true and correct.

11  
12 Dated: August 29, 2025

Respectfully submitted,

13 /s/ Chad E. Bell

14 Chad E. Bell